

BECKER & POLIAKOFF LLP
Julie Gorchkova, Esq.
45 Broadway
New York, NY 10006
(212) 599-3322
jgorchkova@bplegal.com

Presentment Date: November 16, 2015 at 12:00 PM
Objection Date: November 13, 2015

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

DEFENDANTS LISTED ON APPENDIX A
ATTACHED TO THE ACCOMPANYING NOTICE
OF PRESENTMENT,

Defendants.

Adv. Pro. Nos. listed on Appendix A
Attached to the accompanying
Proposed Order

**DECLARATION OF JULIE GORCHKOVA IN SUPPORT OF AN APPLICATION
FOR AN ORDER TO WITHDRAW AS COUNSEL**

I, Julie Gorchkova, hereby declare, under penalty of perjury pursuant to 28 U.S.C. §1746,
as follows:

1. I am an associate with Becker & Poliakoff LLP (“B&P”), counsel of record to Defendants listed on Appendix A attached to the accompanying Proposed Form of Order, (the “Defendants”).

2. I submit this declaration in support of an application for an Order pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules of this Court: (1) authorizing B&P to withdraw as attorneys of record in connection with the proceedings listed on Appendix A and also to request to be removed from any and all mailing matrixes, service lists and Notices of Electronic Filing in connection with those proceedings; and (2) granting such other and further relief as the Court deems just and proper.

3. Unless otherwise stated, the foregoing is based on my personal knowledge.

4. I and/or Peter W. Smith, a former shareholder of B&P, have previously entered appearances on behalf of the Defendants.

5. Recently, Helen Davis Chaitman, lead counsel to the Defendants, moved her practice from B&P to Chaitman LLP. It is my understanding that none of the Defendants have indicated their desire to continue to be represented by B&P.

6. Ms. Chaitman has filed notices of appearance reflecting her new contact information, remains attorney of record for the Defendants, and will continue to represent them.

7. Accordingly, good cause exists to grant the application authorizing B&P to withdraw as counsel for the Defendants.

Dated: November 6, 2015
New York, New York

/s/ Julie Gorchkova